

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Everest Reinsurance Company,

Petitioner,

v.

Pennsylvania National Mutual Casualty
Insurance Company,

Respondent.

Case No.:

**CERTIFICATION OF
JOSEPH J. SCHIAVONE**

Pursuant to 28 U.S.C. § 1746, I, JOSEPH J. SCHIAVONE, hereby certify that:

1. I am a partner of the law firm of Saiber LLC, attorneys for Petitioner Everest Reinsurance Company ("Everest"). As such, I am fully familiar with the facts and procedural circumstances contained herein. I make this Certification in support of Everest's Petition to Compel Existing Arbitration and to Stay Subsequent Arbitration (the "Petition").

2. Exhibit A in support of the Petition is a set of pertinent excerpts from the First Excess of Loss Reinsurance Contract issued to Pennsylvania National Mutual Casualty Insurance Company, effective January 1, 1996.

3. Exhibit B in support of the Petition is a petition to confirm an

arbitration award filed in Pennsylvania National Mutual Casualty Insurance Co. v. New England Reinsurance Corp. and Hartford Fire Insurance Co., No. 1:18-mc-00278 (M.D. Pa. 2018).

4. Exhibit C in support of the Petition is a letter, dated May 3, 2018, filed in Pennsylvania National Mutual Casualty Insurance Co. v. New England Reinsurance Corp. and Hartford Fire Insurance Co., No. 1:18-mc-00278 (M.D. Pa. 2018).

5. Exhibit D in support of the Petition is an Order entered in Pennsylvania National Mutual Casualty Insurance Co. v. New England Reinsurance Corp. and Hartford Fire Insurance Co., No. 1:18-mc-00278 (M.D. Pa. 2018).

6. Exhibit E in support of the Petition is a letter, dated May 16, 2018, from Richard P. Regan, Esq., counsel to Pennsylvania National Mutual Casualty Insurance Company, to Stephen H. Martin of Everest Global Services.

7. Exhibit F in support of the Petition is a letter (without Exhibits), dated July 27, 2018, from Joseph J. Schiavone, Esq. to Daniel E. Schmidt, Esq.; Spiro K. Bantis, Esq.; and Howard D. Denbin, Esq. with copies to Richard P. Regan, Esq. and Lloyd A. Gura, Esq., counsel to New England Reinsurance Corporation and Hartford Fire Insurance Company.

8. Exhibit G in support of the Petition is a letter, dated July 27, 2018,

from Joseph J. Schiavone, Esq. to Richard P. Regan, Esq.

9. Exhibit H in support of the Petition is a letter, dated August 3, 2018, from Richard P. Regan, Esq. to Daniel E. Schmidt, Esq.; Spiro K. Bantis, Esq.; and Howard D. Denbin, Esq. with copies to Lloyd A. Gura, Esq.; Robert Tomilson, Esq.; Joseph J. Schiavone, Esq.; and Jeffrey S. Leonard, Esq.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 14, 2018



JOSEPH J. SCHIAVONE

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